

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

ANDREW PERRONG and STEWART :  
ABRAMSON, individually and on behalf : Civil File No. 2:21-cv-00996-JS-AYS  
of all others similarly situated, :

Plaintiffs, :

v. :

CHARLES BARATTA LLC, a New York :  
limited liability company, ARKADY :  
FREKHTMAN ATTORNEY AT LAW, P.C. :  
d/b/a FREKHTMAN & ASSOCIATES, a :  
New York professional corporation, :  
FLEMING NOLEN & JEZ LLP, a Texas :  
limited liability partnership, RELIABLE :  
LEGAL MARKETING CONSULTING, :  
LLC, a Florida limited liability company, :  
KRAUSE AND KINSMAN LAW, LLC, a :  
Missouri limited liability company, LERNER :  
& ROWE, PC, an Arizona professional :  
corporation, and GACOVINO, LAKE & :  
ASSOCIATES, P.C., a New York :  
Professional corporation. :

Defendants. :

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**STIPULATION OF DISMISSAL WITH PREJUDICE**

NOW COMES the parties, by and through their respective attorneys, and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs hereby voluntarily dismisses all of their individual claims against the Defendants in this action with prejudice, each party to pay their own costs. The putative class claims against Defendants are hereby voluntarily dismissed without prejudice, each party to pay their own costs.

Dated: June 7, 2022

Respectfully submitted,

/s/ Anthony I. Paronich

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*Attorney for Plaintiffs*

Dated: June 7, 2022

/s/ Laura E. Kogan

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**SO ORDERED.**

/s/ JOANNA SEYBERT

Joanna Seybert, U.S.D.J.

Dated: June 24, 2022

Central Islip, New York

The Clerk's Office is directed to  
terminate the pending motions to  
dismiss and to mark this case CLOSED.

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